

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

W.P.V., on his own behalf and on behalf of  
his minor child, W.P.O.,

Plaintiff,

v.

United States of America, Cayuga Home for  
Children, Inc. d/b/a Cayuga Centers,

Defendant.

Civil Action No. 1:21-cv-04436-JPC

**JURY TRIAL DEMANDED**

**PLAINTIFF'S AND CAYUGA CENTERS' JOINT MOTION FOR LEAVE  
TO SETTLE MINOR CHILD W.P.O.'S CLAIMS AGAINST CAYUGA  
CENTERS**

Plaintiff W.P.V., on his own behalf and on behalf of his minor child, W.P.O., and Cayuga Centers (“the Settling Parties”) have reached a settlement agreement to resolve the claims between just those parties. The United States of America is not a part of this settlement and thus, all claims involving the United States of America in this action remain unresolved.

Pursuant to Southern District of New York Local Civil Rule 83.2(a) (Settlement of Actions by or on Behalf of Infants or Incompetents) and New York Civil Practice Law and Rules Sections 1207 and 1208, the Settling Parties jointly move the Court for leave to settle the claims of minor child W.P.O. against Cayuga Centers on the agreed-upon terms based upon the following:

- Affidavit of W.P.V., and all exhibits;
- Affidavit of Aamir Kazi, counsel for Plaintiff W.P.V., on his own behalf and on behalf of his minor child, W.P.O., and all exhibits;
- General Release; and
- Prior pleadings, proceedings, and order of this Court.

Respectfully submitted,

Dated: January 13, 2023

/s/ Aamir A. Kazi

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***Attorneys for Defendant***

Cayuga Home for Children, Inc. d/b/a  
Cayuga Centers

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on January 13, 2023, a true and correct copy of the foregoing document was filed with the Clerk of the Court using the Court's CM/ECF system, which will send notification of such filing to all counsel of record.

Dated: January 13, 2023

/s/ Aamir A. Kazi

Aamir A. Kazi